







April 1, 2011

Mr. Joel Gurin Chief Consumer and Governmental Affairs Bureau Federal Communications Commission 445 12th Street SW Washington, DC 20554

Ms. Ruth Milkman Chief Wireless Telecommunications Bureau Federal Communications Commission 445 12th Street SW Washington, DC 20554

> **Request for Extension of Comment Filing Deadline** RE: CG Docket No. 10-213, WT Docket No. 96-198, CG Docket 10-145

Dear Mr. Gurin and Ms. Milkman:

We are writing to respectfully request a thirty (30) day extension in the time period allotted to file comments pertaining to the above-referenced proceeding. This proceeding seeks comments regarding the "advanced communications services" ("ACS") provisions of the Communications Act of 1934, as enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010. A full sixty (60) day comment period will ensure that the Commission has complete access to the significant knowledge base that exists among affected stakeholders.

In our view, the ACS provisions are the key focus of this landmark legislation. Once implemented, they will have far-reaching impacts on consumers and manufacturers, including the small businesses that develop assistive technologies essential to persons with disabilities.

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Given the importance and complexity of this rulemaking, we believe that it is essential that stakeholders have adequate time to fully and carefully analyze the Commission's proposed rules. This will allow us to develop comprehensive recommendations. Further, a 60-day comment period would be consistent with the time period provided by the Commission in rulemakings of a similar nature.

Thank you for your consideration.

Respectfully submitted,

Paul W. Schroeder Vice President, Programs and Policy American Foundation for the Blind 202.822.0832 PSchroeder@afb.net

John Neuffer Vice President, Global Policy Information Technology Industry Council 202.626.5735 jneuffer@itic.org Julie Kearney Vice President, Regulatory Affairs Consumer Electronics Association 703.907.7644 jkearney@ce.org

Danielle Coffey Vice President, Governmental Affairs Telecommunications Industry Association 202.346.3243 dcoffey@tiaonline.org

cc: Ms. Karen Peltz Strauss
Deputy Bureau Chief
Consumer and Governmental Affairs Bureau

Ms. Elizabeth Lyle Special Counsel for Innovation Wireless Telecommunications Bureau